

**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
AIKEN DIVISION**

Tamika Jackson,

Plaintiff

vs.

The Raymond Corporation and Toyota  
Material Handling, Inc.

Defendants.

Civil Action No.: 1:23-cv-06437-CMC

**THE RAYMOND CORPORATION  
AND TOYOTA MATERIAL  
HANDLING, INC.'S IDENTIFICATION  
OF EXPERT WITNESSES**

Pursuant to Fed. R. Civ. P. 26(a)(2)(B) and this Court's Scheduling Order, Defendants The Raymond Corporation and Toyota Material Handling, Inc., by their undersigned attorneys, disclose the following experts:

**1. Michael W. Rogers, P.E.**

Fusion Engineering  
1804 Centre Point Circle, Suite 112  
Naperville, IL 60563

Mr. Rogers' report and additional information required by Fed. R. Civ. P. 26 are being provided to all counsel of record. Fusion Engineering provides Mr. Rogers' services for this matter at \$460 per hour.

**2. Kathleen Rodowicz, Ph.D., P.E.**

Carr Engineering, Inc.  
12500 Castlebridge Drive  
Houston, Texas 77065-4532

Dr. Rodowicz's report and additional information required by Fed. R. Civ. P. 26 are being provided to all counsel of record. Carr Engineering, Inc. provides Dr. Rodowicz's services for this matter at \$550 per hour.

**WEINBERG, WHEELER, HUGINS,  
GUNN & DIAL, LLC**

*s/ Brannon J. Arnold* \_\_\_\_\_

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*Attorneys for Defendants The Raymond  
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April 14, 2025  
Atlanta, Georgia

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing has been furnished to counsel of record herein by using the Court's electronic filing system as follows:

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*Counsel for Plaintiff*

This 14<sup>th</sup> day of April, 2025.

/s/ Brannon J. Arnold, Esq.

Brannon J. Arnold  
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